



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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March 5, 2001

CERTIFIED RETURN RECEIPT  
7000 0520 0021 7582 8685

Mr. Spenst Hansen  
Keystone Surveys  
44 Broadway, Suite 704S  
Salt Lake City, Utah 84101

Re: Reclamation of the Mammoth Mine and Exploration Project Sites, Mammoth Mining Company,  
Mammoth Mine, S/023/041 and E/023/033, Juab County, Utah

Dear Mr. Hansen:

On July 17, 2000, we received your reclamation plan proposal for the Mammoth Mine and the associated exploration project sites. The Division reviewed the plan and sent our initial review to you on September 21, 2000. In our review we raised concerns regarding the lack of proposed reclamation for certain mining related disturbances which we believe are your responsibility.

Subsequent meetings were held with you on October 27 and 30<sup>th</sup>, 2000, at the Division offices. We discussed our reclamation concerns with you during these meetings. You stated that much of the work previously performed by your company and/or your business associates was done without the use of mechanized equipment and would not fall under our regulatory jurisdiction. On November 15, 2000, the Division received your written response to the concerns outlined in our September 21, 2000 review letter.

Having reviewed your response, the following issues still need to be addressed in order to resolve the permitting issues and complete appropriate reclamation of these sites. To expedite the closing of the mining related features and surface disturbances, we have divided this letter into three areas of concern as follows:

## **Concern #1**

### **Mammoth Small Mine Permit - S/023/041**

The reason provided for not reclaiming the existing mining related features is based upon a proposal for continued use as part of the future Mammoth Town Development. Your request included leaving the following features unreclaimed:

- **5. Butterfly Gap Road (exhibit ten)**

The Division measured the disturbance associated with this road at approximately 2.1 acres. Your response that the road will be used for the Mammoth Town Development is unacceptable at this time. The variance requirements of Rule R647-3-110 are not satisfied. All appropriate state, county and local approvals and/or clearances (e.g., Juab County Planning and Zoning Commission, city council, etc.) will also be required to substantiate your proposal for the Mammoth Town Development, before a variance from reclamation will be considered.

- **6. Mammoth Mine Area (exhibit eleven)**

The Division has measured the Mammoth Mine complex disturbance at 4.725 acres, the original permitted area was 2.09 acres. The additional disturbance beyond the original 2.09 acres was never applied for or amended to the small mine permit. *A variance was granted to Centurion Mines under the original Small Mining Operation permit authorizing certain facilities to remain at the time of mine closure. These facilities included the two houses, a garage, a mine dry room and a shop.* The approved variance for these facilities was to allow for continued exploration and mine development. This variance was granted based on a specific post mining land use. The proposed post mining land use has changed; therefore, the conditions of the original variance no longer apply. (4.7+ acres)

- **9. Road above the Plummer Tunnel (exhibit fourteen)**

The response that the road will be used for access to the water tanks for the Mammoth Town Development is unacceptable at this time. The variance requirements of Rule R647-3-110 have not been satisfied. (0.5 acres includes road and pad)

- **10. Nad Breccia Road (exhibit nineteen)**

The response that the road will be used for the Mammoth Town Development is unacceptable at this time. The variance requirements of Rule R647-3-110 have not been satisfied. (0.5 acres for the road)

- **20. Nad Breccia Drill Pad (exhibit twenty-four)**

The response that the pad (which is part of the Nad Breccia Road) is essential to the post-mining purposes of Mammoth Town Development is unacceptable at this time. The variance requirements of Rule R647-3-110 have not been satisfied. (0.15 acres)

- **23. Mammoth Lower Tunnel Road (exhibit twenty-eight)**

This area was used for mining and/or exploration related purposes. Therefore, it falls under the same reclamation category as the other mining related disturbances. The response that the road will be used and maintained for the Mammoth Town Development is unacceptable at this time. The variance requirements of Rule R647-3-110 have not been satisfied. (0.1 acres)

- **25. Mammoth Mine Storage Area (Exhibit twenty-eight)**

The response that the pad area will be used for the storage of mine-related historic artifacts pending construction of the Mammoth Town Museum, and for short and long-term storage of

vintage lumber, antique mining equipment, and/or rock for construction of Mammoth Town is unacceptable at this time. The variance requirements of Rule R647-3-110 have not been satisfied. (0.391 acres)

The entire disturbance surrounding the Mammoth Mine site area and including the mine site complex is calculated at approximately 8.5 acres. This composite disturbance exceeds the five (5) acre threshold for a small mining operation. Therefore, the entire disturbance now falls under a large mine category. The Utah Mined Land Reclamation Act and Minerals Rules require mining related disturbances which exceed five (5) surface acres to have detailed mine reclamation plans and adequate surety in place to ensure appropriate reclamation will be performed.

## **Concern #2**

**Mine disturbances which you stated had no post -1975 mechanized surface disturbing activities performed.**

2. C.E. (Centennial Eureka) Shaft (Exhibit two)

3. Chicken hawk, Boarding House (exhibit three)

New Years, and un-named Surface adits (exhibit four)

17. Carisa Tunnel (exhibit six)

18. Boss Tweed tunnel (exhibit seven)

19. Star Tunnel (exhibit eight)

20. Columbus Tunnel

7. Mammoth Glory Hole (Exhibit Twelve)

8. Mammoth Copper Oxide Adit (exhibit thirteen)

10. Mammoth Hole-in-the-Wall

11. Mammoth Finn Tunnel (exhibit sixteen)

10. Mammoth Hungarian Tunnel (exhibit seventeen)

13. Ajax Mine Adit and Drill Pad (exhibit twenty)

14. Gold Chain Tunnel (exhibit twenty-one)

22. Mammoth Water Tanks (exhibit twenty-six)

Total affected acreage is unknown at this time. *A Division field inspection will be required to confirm the areas which can be exempted from your continued reclamation responsibility.*

### **Concern #3**

#### **The Company has agreed to reclaim the following openings, pads, etc.**

**1. C.E Holden Tunnel (exhibit one)**

*The Company agrees to increase the strength and configuration of the steel gate.*

**4. Grand Central Tunnel**

*The Company agrees, at its expense and discretion, to backfill the tunnel, smooth out the closure, and re-vegetate the area.*

**11. Plummer Tunnel (exhibit eighteen)**

*The Company affirms that it will, at its expense, appropriately backfill and/or otherwise stabilize and permanently close this tunnel.*

**13. Ajax Mine Adit and Drill Pad (exhibit twenty)**

*The drill pad is an essential part of the road and serves as a turnaround. The Company reaffirms its intention to reseed portions of the drill pad.*

**16. Lower Mammoth Tunnel (exhibit twenty-three)**

*The Company agrees to increase the strength and configuration of the steel gate.*

**21. Mammoth 300 FT. level Tunnel (exhibit twenty-five)**

*The Company agrees to increase the strength and configuration of the steel gate.*

Detailed closure and reclamation design plans for each of these areas/features *must be received by the Division within 45 days* of your receipt of this letter. The Division must approve of the closure design plans before reclamation work begins.

### **Conclusion**

Based upon preliminary field observations of the exploration and mining-related disturbances, made by Division staff on April 6 and 7th, 2000, approximately 8.5 acres of disturbance is associated with the Mammoth Mine project area (S/023/033). This exceeds the allowable acreage for continued categorization as a small mining operation. Until supportive information is provided to substantiate your variance request to change the post-mining land use for the Mammoth Mine Project area (Concern #1), the Division will require a **\$25,500 (\$3000/acre X 8.5 acres) transitional** reclamation surety and reclamation contract. The transitional bond *must be submitted within 60 days* of your receipt of this letter.

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An additional surety amount may also be required for those disturbances and features listed under Concern #2, depending upon the results of the Division's onsite assessment of these sites. This inspection will be scheduled as soon as weather conditions provide reasonable access to the area.

If you have any questions regarding the requirements in this letter, please contact me at (801) 538-5286, or Tom Munson (538-5321) of the Minerals Reclamation Program at your earliest convenience. Thank you for your cooperation in resolving this outstanding permitting concern.

Sincerely,

A handwritten signature in black ink that reads "D. Wayne Hedberg". The signature is fluid and cursive, with the first name "D." and last name "Hedberg" clearly legible.

D. Wayne Hedberg  
Permit Supervisor  
Minerals Regulatory Program

jb  
Enclosure  
cc: Kurt Seel, Asst. Attorney General  
Mary Ann Wright, DOGM  
Tom Munson, DOGM  
Mark Mesch, DOGM  
shansen-ltr